

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**FARMERS
TELECOMMUNICATIONS
COOPERATIVE, INC.,**

Plaintiff,

v.

**VERIZON COMMUNICATIONS INC.,
VERIZON BUSINESS, QWEST
COMMUNICATIONS
INTERNATIONAL, INC., and Fictitious
Defendants A, B, C, and D,**

Defendants.

CIVIL CASE NO. 2:06cv-790-VPM

**UNOPPOSED MOTION TO EXTEND TIME FOR VERIZON BUSINESS NETWORK
SERVICES, INC., AND QWEST COMMUNICATIONS CORPORATION TO FILE AN
ANSWER OR OTHER RESPONSIVE PLEADINGS**

Defendants Verizon Business Network Services Inc. ("Verizon Business") and Qwest Communications Corporation ("QCC") respectfully move the Court to grant an extension of time until December 15, 2006, for these Defendants to file an Answer or other responsive pleadings. Defendants state in support thereof as follows:

1. Verizon Business and QCC's parent company, Qwest Communications International, Inc. ("QCII"), received from Plaintiff's counsel a letter dated September 13, 2006, enclosing the Complaint, the Notice of Lawsuit, and the Request for Waiver of Service of Summons.

2. Verizon Business and QCII timely returned the Waiver of Service to Plaintiff's counsel.

3. Defendants and Plaintiff are contemporaneously filing with this Motion a Joint Motion to Dismiss Verizon Communications, Inc. and QCII as Defendants and substitute proper

parties from whom an Answer or other responsive pleadings in the above-styled cause are due. That motion additionally stipulates that QCC shall not seek dismissal of the Complaint for insufficiency of process or insufficiency of service of process pursuant to Rules 12(b)(4) or 12(b)(5).

4. It is the understanding of Verizon Business and QCC, now the only proper Defendants to this action, that an Answer and other responsive pleadings are due on November 13, 2006.

5. The parties to this complaint are actively engaged in settlement discussions and wish to minimize litigation expenses while those discussions are on-going.

6. Verizon Business and QCC have conferred with Plaintiff's counsel and Plaintiff's counsel do not oppose this motion to extend the time for an answer or other responsive pleading to December 15, 2006.

A proposed Order is attached hereto.

DATED: November 6, 2006

Respectfully submitted,

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Counsel for Defendant Verizon Business Network Services, Inc.

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CIVIL CASE NO. 2:06cv-790-VPM

VERIZON COMMUNICATIONS INC.,)
VERIZON BUSINESS, QWEST)
COMMUNICATIONS)
INTERNATIONAL, INC., and Fictitious)
Defendants A, B, C, and D,)

Defendants.)

[PROPOSED] ORDER

WHEREFORE, upon consideration of the motion submitted by Verizon Business Network Services, Inc. and Qwest Communications Corporation, and for good cause shown, the Unopposed Motion to Extend Time for Verizon Business Network Services, Inc. and Qwest Communications Corporation to File an Answer or Other Responsive Pleadings is hereby **GRANTED**, and the new deadline for each to file and serve an answer or other responsive pleading is December 15, 2006.

IT IS SO ORDERED

DATED: _____

VANZETTA P. MCPHERSON
UNITED STATES MAGISTRATE JUDGE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and have also served a copy of the foregoing by U.S. Mail to the following:

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